

Message

From: Hanson, Robyn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C4CD36EF688F47ABA2373A33B5D9B8FF-HANSON, ROB]
Sent: 3/19/2021 7:22:40 PM
To: Cathy Laughner [cathyl@bkbh.com]
CC: Thomas Jodoin [TJODOIN@helenamt.gov]
Subject: RE: City of Helena paragraphs 112, 113

Cathy,

I do not think I acknowledged receipt of your redlines earlier this week, so let me do so now. We will consider them and get back to you.

-Robyn

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From: Cathy Laughner <cathyl@bkbh.com>
Sent: Monday, March 15, 2021 5:16 PM
To: Hanson, Robyn <Hanson.Robyn@epa.gov>
Cc: Thomas Jodoin <TJODOIN@helenamt.gov>
Subject: City of Helena paragraphs 112, 113

Robyn,

Thank you for your responses to my questions and our 3/12 discussion regarding paragraphs 112 and 113. I have studied the regulations, and believe the attached revised paragraphs are consistent with the regulations. The City does not know what "approvable form" is in paragraph 113, so would have a hard time satisfying that condition.

I appreciate your willingness to consider a redline of these paragraphs. If you do not agree that this language would work, and if there has been some adjudication interpreting the applicable regulations, please point me in the right direction to this authority.

Thank you.
Cathy Laughner